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June 29, 1993

Hand Delivered

Ms. Donna R. Searcy Secretary Federal Communications Commission 1919 M Street, N.W. Washington, D.C. 20554

Re: PR Docket No. 92-257, RM-7956, RM-8031

Dear Ms. Searcy:

Transmitted herewith, on behalf of KFS World Communications, Inc., are an original and nine copies of its Reply Comments in the above-referenced proceeding.

In the event there are any questions concerning this matter, please communicate with this office.

Very truly yours,

Charles R. Naftalin

Enclosures

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## Before the FEDERAL COMMUNICATIONS COMMISSION JUN 2 9 1993

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

In the Matter of:	)	
	)	PR Docket No. 92-257
Amendment to the Commission's	)	
Rules Concerning Maritime	)	RM-7956
Communications	)	RM-8031

Reply Comments of KFS World Communications Inc.

Washington D.C. 20554

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KFS World Communications offers these reply comments in response to the Comments of Mobile Marine Radio.

KFS whole-heartedly concurs with Mobile Marine Radio's request to rescind current operator licensing requirements for maritime coast stations operations. These current operation rules were developed decades ago when operators were located at transmitter sites. Today operators are remotely located and work at computer work stations. Their knowledge of computer operating systems and local area networks is far more relevant to their work than the subject matter covered by FCC licensing procedures.

Like Mobile Marine Radio, we do not seek any waiver of technical qualifications or proper licensing of those people who actually service coast station transmitters.

This change in licensing requirements would allow public coast stations to draw upon a larger pool of potential employees with skills better suited to the station's needs. This improved "fit" would facilitate the introduction of new and better services to the maritime community and extend the longevity of public coast stations.

We urge the FCC to add this reform to its rule making agenda.

Yours truly,

Gary R. North

President